

**REMARKS/ARGUMENTS**

The Applicants originally submitted Claims 1-24 in the application. In the present preliminary amendment, the Applicants have amended Claims 1-9, 17 and 23. The Applicants have not amended, canceled or added any other claims. Accordingly, Claims 1-24 are currently pending in the application.

**I. Formal Matters and Objections**

The Examiner has objected to the specification because of informalities. In response, the Applicants have amended the specification as suggested by the Examiner to correct these inadvertent errors. Accordingly, the Applicants respectfully request the Examiner to withdraw the objection to the specification.

**II. Rejection of Claims 1, 9 and 17 under 35 U.S.C. §102**

Previously, the Examiner rejected Claims 1, 9 and 17 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,633,882 to Fayyad, *et al.* The Applicants respectfully disagree since Fayyad does not teach discovering at least one model of data mining models with guaranteed error bounds of at least one attribute in a data table in terms of other attributes in different columns of the data table as recited in independent Claims 1, 9 and 17. Additionally, Fayyad does not teach selecting a subset of the at least one model to form a basis upon which to compress the data table to form a compressed data table as recited in independent Claims 1, 9 and 17.

Fayyad discloses employing a data mining engine to produce a clustering model derived from a database. (*See* column 5, lines 20.) The clustering model is not, however, of an attribute in a

data table in terms of other attributes in the data table. On the contrary, the clustering model in Fayyad is based on a mean for each dimension of data within a database. (See column 3, lines 51-53.) Thus, Fayyad does not even model attributes in terms of other attributes but instead uses clusters determined from a plot of dimensions of the database to model the database. Referring to Table 1 for example, Fayyad models the database using clusters derived from a plot of the "years employed" versus "salary." Fayyad does not model "years employed" in terms of other attributes, such as, "salary." (See column 5, lines 26-44.) Fayyad provides no model of an attribute as presently claimed but provides a model of a database using clusters. (See paragraphs 42-43 on pages 15-16 of the present specification.) Fayyad, therefore, does not teach discovering at least one model of data mining models with guaranteed error bounds of at least one attribute in a data table in terms of other attributes in different columns of the data table as recited in amended independent Claims 1, 9 and 17.

Fayyad also does not teach selecting a subset of the at least one model of the at least one attribute to form a basis upon which to compress the data table to form a compressed data table as recited in amended independent Claims 1, 9 and 17. Instead, Fayyad selects clusters to model a database. The selected clusters may be fine tuned to provide a better model but this is not equivalent to forming a basis upon which to compress a data table. On the contrary, the selected clusters are a compressed data table, not a basis upon which to compress.

Since Fayyad does not teach each element of amended independent Claims 1, 9 and 17, Fayyad does not anticipate Claims 1, 9 and 17. Accordingly, the Applicants respectfully request the Examiner to withdraw the §102 rejection with respect to Claims 1, 9 and 17 and allow issuance thereof.

### III. Rejection of Claims 2-8, 10-16 and 18-24 under 35 U.S.C. §103

Previously, the Examiner rejected Claims 2-8, 10-16 and 18-24 under 35 U.S.C. §103(a) as being unpatentable over Fayyad in view of U.S. Patent No. 5,799,311 to Agrawal, *et al.*, ("Agrawal 311") for Claims 2, 4-5, 8, 10, 12-13, 16, 18, 20-21 and 24; U.S. Patent No. 6,810,368 to Pednault for Claims 2-3, 10-11 and 18-19; U.S. Patent No. 6,189,005 to Chakrabarti, *et al.*, for Claims 6, 14 and 22; and U.S. Patent No. 6,651,048 to Agrawal, *et al.* ("Agrawal 048") for Claims 7, 15 and 23. The Applicants respectfully disagree.

As discussed above, Fayyad does not teach selecting a subset of at least one data mining model to form a basis upon which to compress a data table as recited in independent Claims 1, 9 and 17. Additionally, Fayyad does not suggest discovering at least one model of data mining models with guaranteed error bounds of at least one attribute in a data table in terms of other attributes in different columns of the data table as recited in amended independent Claims 1, 9 and 17. Instead, Fayyad discloses using clusters to model a data base. (See column 5, lines 21-44 and Figure 5.) Agrawal 311, Pednault, Chakrabarti and Agrawal 048 were not cited to cure the above deficiency of Fayyad but to teach the subject matter of the dependent claims identified above. Accordingly, the cited combinations of Fayyad with either Agrawal 311, Pednault, Chakrabarti or Agrawal 048 do not provide a *prima facie* case of obviousness of independent Claims 1, 9 and 17 and Claims dependent thereon. Thus, the cited combinations of Fayyad with either Agrawal 311, Pednault, Chakrabarti or Agrawal 048 do not render obvious Claims 2-8, 10-16 and 18-24. The Applicants, therefore, respectfully request the Examiner withdraw the under §103(a) rejection of Claims 2-8, 10-16 and 18-24 and allow issuance thereof.

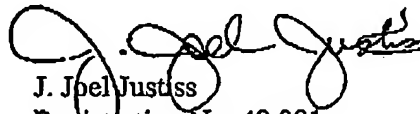
**IV. Conclusion**

In view of the foregoing amendment and remarks, the Applicants now see all of the Claims currently pending in this application to be in condition for allowance and therefore earnestly solicit a Notice of Allowance for Claims 1-24.

The Applicants request the Examiner to telephone the undersigned attorney of record at (972) 480-8800 if such would further or expedite the prosecution of the present application.

Respectfully submitted,

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